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November 9, 2021

Via ECF

Magistrate Judge Douglas E. Arpert
Clarkson S. Fisher Building
& U.S. Courthouse
402 East State Street
Trenton, NJ 08608

**Re: Agudath Israel of America et al v. Township of Jackson, et al.
Docket No.: 3:17-CV-03226**

As a follow up to status conference conducted on November 8, 2021, the Township immediately investigated the time and cost associated with a 30-day ESI privilege review production and determined that based on the approximately 280,000 individual pages remaining to be reviewed, it would be a very difficult task to achieve. As a practical solution that the Township has proposed is to have the ESI Vendor cull all of the emails to or from law firms and attorneys based on a metadata and party search. The Township would then immediately produce the remaining documents subject to and understanding that if a privileged document was inadvertently disclosed, it would be destroyed and/or returned by the receiving party. The Township would then undertake a privilege review only of those materials that have been culled from the initial production.

I have discussed this matter with both the United States attorneys and private action Plaintiff attorneys, both are discussing same internally and will advise our office as to their thoughts and/or consent within the coming days. During the interim period, our office will be gathering the domain for all attorneys and law firms that have represented the Township within the last 21 years so that we can determine the scope of the reduced privileged review. Of course this office will continue to keep Your Honor apprised of all developments in production, however, in in the interim if Your Honor has any questions or concerns we will promptly respond to same.

Respectfully submitted,

/s/Brent R. Pohlman, Esq.
BRENT R. POHLMAN, ESQ.